



UNITED STATES | ENGLAND | GERMANY | CHINA

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April 26, 2007

VIA EMAIL

Mr. Richard T. Garren
Riggs, Abney, Neal, et al.
502 West Sixth Street
Tulsa, OK 74119-1010

Re: State of Oklahoma v. Tyson, et al.
Case No. 05-CV-0329 GKF-SAJ

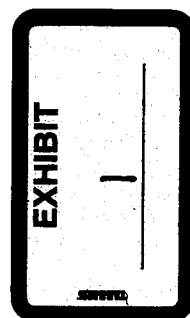
Dear Mr. Garren:

The Cargill defendants will complete production of hard-copy files responsive to the State's document requests in the near future. The Cargill defendants will then produce more electronically stored information it has identified as responsive to the State's requests. Pursuant to the recommendations and reasoning set forth in *The Sedona Principles: Best Practices Recommendations & Principles for Address Electronic Document Production* (July 2005), Cargill will produce its remaining ESI in TIFF rather than native format.

With regard to responsive information in the Cargill defendants' communication systems (e.g. Microsoft Outlook email and the MyTurkey.com intranet) and office productivity systems (e.g. Microsoft Word, Excel and PowerPoint applications), the Cargill defendants have already produced any responsive information that may have been printed out and retained in their hard-copy files. The Cargill defendants will produce responsive ESI from these systems in TIFF format. Consistent with the State's previously expressed preference, the files provided will contain single-page TIFF images, each bearing a unique file name. As with each of our prior productions, a text file will be provided along with the TIFF. The text of native files will be extracted directly from the native file, but the Cargill defendants will not produce metadata.

With regard to the Cargill defendants' productivity systems (e.g. FICIMS, BILLS, REPETE, TFS etc.), the Cargill defendants have already produced custom reports generated by them in the normal course of business that are responsive to the State's requests. For example, the Cargill defendants have produced Prime Cost Settlement Reports, which are

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custom reports generated from TFS that contain information regarding feed, medications and grower payment, among other things. We acknowledge that these systems may be capable of reporting the responsive information in different formats than previously provided. However, the Cargill defendants do not anticipate making any further production of ESI contained in these systems at this time. Should the State seek additional or different reports from these systems at some point in the future, the Cargill defendants will certainly consider such a specific request when and if made.

Our intention is to commence production of this remaining ESI after May 4th. If you have any questions or concerns about Cargill's proposed method of production of ESI as outlined above, please contact Theresa or me before May 4th.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Mann', is written over a rectangular area of the document that has been shaded with a light gray stippled pattern.

Dara D. Mann

MANDD

cc: Trevor Hammons
Theresa Hill

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